



MASSACHUSETTS
BAY
TRANSPORTATION
AUTHORITY

Railroad Operations
Engineering Department
32 Cobblehill Road
Somerville, MA 02143

DOCKET FILE COPY ORIGINAL

RECEIVED

JUN - 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 28, 1993

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20054

RE: Comments - Notice of Proposed Rule Making,
PR Docket No. 92-235

Dear Ms. Searcy:

The Massachusetts Bay Transportation Authority (MBTA) submits an original and nine copies of the following comments relating to the Federal Communications Commission (F.C.C.) Notice of Proposed Rulemaking which has proposed regulatory changes to alleviate congestion and increase efficiency of spectrum utilization in the frequency bands below 512 MHz allocated to private land mobile radio services (PLMR). The MBTA supports the comments submitted by the Association of American Railroads.

The MBTA operates a commuter system that is comprised of 479 track miles spread over 11 different main line and branch lines within eastern Massachusetts spreading north to the New Hampshire border, south to the Rhode Island border and west to Framingham and Fitchburg. These MBTA owned rail lines also accommodate four freight carrying railroads which include Conrail, Guilford Transportation Industries, Bay Colony, Providence and Worcester. Amtrak Intercity trains make daily trips from South Station to New York and Chicago. The MBTA services 75,000 passengers at 100 stations daily.

The MBTA's major concern with a change in the spectrum utilization is based on a decrease in safety of train operations due to loss of Railroad Radio Service frequencies. These specific frequencies were set aside by the FCC in 1944 as indicated by the AAR in their comments. The FCC based this decision on safety of train operations.


The MBTA, like other railroads across the country, uses Railroad Radio Service frequencies coordinated by the Association of American Railroads ("AAR"). These frequencies are used for Private Land Mobile Radio ("PLMR") services that are critical to the safety of our passenger operations. The MBTA operates in close

No. of Copies rec'd 2
List A B C D E 2

proximity to Consolidated Rail Corporation ("Conrail"), Guilford Transportation Industries ("GTI"), Bay Colony ("BCRR"), Providence and Worcester ("P&W") and National Railroad Passenger Corporation ("Amtrak"). The successful inter-facing of these railroads' trains in a safe and efficient manner is paramount to an effective system. Constant, uninterrupted radio communication provides information on train movements which safeguards the lives of passengers, the general public and railroad personnel. The Railroad Radio Service coordinated by the AAR protects these critical functions of Railroad Radios.

The MBTA has reviewed the comments filed by AAR and Conrail, which call attention to the critical safety role of the Railroad Radio Service, and strongly supports the maintenance of Railroad Radio Service with AAR as frequency coordinator.

Sincerely,

A handwritten signature in dark ink, appearing to read 'W. A. MacDonald', written in a cursive style.

William A. MacDonald
Chief Engineering and
Maintenance Officer

WAM/DFS:td

cc: M. T. Burns